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Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

In re SAG-AFTRA HEALTH DATA BREACH
LITIGATION

This Document Relates to: All Actions

Case No. 2:24-CV-10503-MEMF-JPR
CONSOLIDATED ACTION

NOTICE OF SETTLEMENT

Plaintiffs Matthew Rouillard, Kristy Munden, Lee Wilkof, Steven Barr, and Massimiliano Furlan (“Plaintiffs”) and Defendant SAG-AFTRA Health Plan (“Defendant,” together with Plaintiffs, the “Parties”), by and through their respective undersigned attorneys, respectfully notify this Court that Parties have reached a settlement of this dispute, in principle.

Based on the timing of the settlement, Plaintiffs intend to file a Motion for Preliminary Approval of Class Action Settlement together with a finalized Settlement Agreement by September 12, 2025.

Based on the foregoing, the Parties request that the Court stay all deadlines related to this action pending approval of the settlement and any other existing deadlines pending dismissal.

DATED: August 12, 2025

By: /s/ Gregory Haroutunian

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DATED: August 12, 2025

By: /s/ Sean P. Killeen

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SAG-AFTRA Health Plan

Certification of Compliance with C.D. Cal. L.R. 5-4.3.4

I hereby certify that pursuant to C.D. Cal. L.R. 5-4.3.4, I have obtained the authorization from the above signatory representing Defendant to file the above-referenced document, and the above signatory concurs in the filing's content.

DATED: August 12, 2025

/s/ Gregory Haroutunian
Gregory Haroutunian